

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**ALBERTO PATINO,
MARIA DEL ROSARIO MARTINEZ,
MARIA MARI,
RODOLFO R. TENREIRO, and
PATRICIA GONZALES,
Plaintiffs,**

VS.

Civil Action No. 4:14-CV-03241-LHR

**CITY OF PASADENA,
Mayor JOHNNY ISBELL,
Council Members ORNALDO YBARRA,
BRUCE LEAMON, DON HARRISON,
PAT VAN HOUTE,
CODY RAY WHEELER, PHIL
CAYTEN, STEVE COTE, and
DARRELL MORRISON,
*Defendants.***

DEFENDANT'S WITNESS LIST

WITNESSES WHO WILL BE CALLED:

- ## 1. Johnny Isbell

Mayor, City of Pasadena
1211 Southmore
Pasadena, Texas 77502

Mayor Isbell is expected to testify regarding City of Pasadena political and electoral history, the structure of Pasadena city government, the operations and working dynamics of the Pasadena City Council, the 2013 Bond/Charter Review Committee, the change in the City Council electoral system from an 8 single-member-district-system to a 6 single-member, 2 at-large-district-system, his motivations for proposing the change to the 6-2 system, his political activities related to City elections, the drafting of the 6-2 system maps, elections under the 6-2 system, demographics of the City of Pasadena, the operations of city departments, the expenditure of city funds, and the City's responsiveness to the needs of the Hispanic community.

2. Andy Helms

Director of Financial Planning, City of Pasadena
1211 Southmore
Pasadena, Texas 77502

Mr. Helms is expected to testify about his knowledge regarding the Mayor's motivations for the change to the 6-2 system, the City's engagement of legal counsel in 2013 to advise on charter changes and redistricting, capital improvements in the City of Pasadena, and monetary expenditures by the City in various City Council districts throughout the City.

3. Patricia Van Houte

Pasadena City Council, At-Large G
603 Scott Street
Pasadena, Texas 77506

Ms. Van Houte is expected to testify regarding the 2013 Bond/Charter Review Committee, her observations regarding the Mayor's motivations for the change to the 6-2 system, the working dynamics of the City Council, City Council elections and campaigns, elections under the 6-2 system, the involvement of partisan groups in City elections, and Hispanic voter turnout.

4. Cody Ray Wheeler

Pasadena City Council, District D
2007 South Rayburn Court
Pasadena, Texas 77502

Mr. Wheeler is expected to testify regarding City Council elections and campaigns, the involvement of partisan groups in City elections, the demographics of City council districts, elections under the 6-2 system, candidates of Hispanic choice in City elections, and Hispanic voter turnout.

5. Oscar Del Toro

1331 Diamante Drive
Pasadena, Texas 77504

Mr. Del Toro is expected to testify about his 2015 campaign for City Council and Hispanic voter turnout.

6. Norfleet W. "Bill" Rives

Consulting Demographer
3630 Romnay Road
Columbus, Ohio 43220

Dr. Rives is Defendant's expert who is expected to testify regarding the historical, current, and projected demographics of Pasadena, focusing on the data and trends as they relate to the Hispanic population and its growth. Dr. Rives will also testify in rebuttal to Plaintiffs' experts.

7. Dr. John Alford

Department of Political Science
Rice University - MS-24
P.O. Box 1892
Houston, Texas 77251

Dr. Alford is expected to testify regarding the *Gingles* preconditions, the Senate factors, Pasadena demographics, voting patterns, election history, Hispanic voter turnout, the extent of racially polarized bloc voting in Pasadena, and at-large election systems. Dr. Alford will also testify in rebuttal to Plaintiffs' experts.

WITNESSES WHO MAY BE CALLED

1. Celestino Perez

502 Bertloma
Pasadena, Texas 77502

Mr. Perez may testify regarding his 2015 campaign for City Council and Hispanic voter turnout.

2. Orinaldo Ybarra

Pasadena City Council, District A
224 Wafer
Pasadena, Texas 77506

Mr. Ybarra may testify about his campaigns for City Council, City Council campaigns in general, his observations about the Mayor's motivations for the change to the 6-2 system, elections under the 6-2 system, and Hispanic voter turnout.

3. Sarah Benavides

Planning Director and Engineer, City of Pasadena
1211 Southmore
Pasadena, Texas 77502

Ms. Benavides may testify about the development of the 6-2 proposal.

4. Roy Mease

6643 Gleneagles Drive
Pasadena, Texas 77505

Mr. Mease may testify about the 2013 Bond/Charter Review Committee.

If any other witnesses will be called at trial, their names, addresses and the subject matter of their testimony will be reported to opposing counsel as soon as they are known. This restriction will not apply to rebuttal or impeachment witnesses, the necessity of whose testimony cannot reasonably be anticipated before trial.

OF COUNSEL:

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Respectfully submitted,

By: /s/ C. Robert Heath
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